

1 **DRAFT**
2 **FINDING OF NO SIGNIFICANT IMPACT**
3 **ADDRESSING AN ARMY AND AIR FORCE EXCHANGE SERVICE**
4 **LIFESTYLE CENTER**
5 **AT FORT SAM HOUSTON, SAN ANTONIO, TEXAS**

6
7 Pursuant to the Council on Environmental Quality’s regulations for implementing procedural provisions
8 of the National Environmental Policy Act (40 Code of Federal Regulations [CFR] 1500–1508), 32 CFR
9 Part 989 and Department of Defense Directive 6050.1, the U.S. Army has conducted an Environmental
10 Assessment (EA) to identify potential effects associated with constructing and operating the Army and
11 Air Force Exchange Service (AAFES) Lifestyle Center at Fort Sam Houston (FSH), Texas. The EA is
12 incorporated by reference into this finding.

13 **INTRODUCTION**

14 AAFES provides merchandise and services to active-duty, guard, and reserve members; military retirees;
15 and their families on USAF and Army installations. The mission of AAFES is to provide quality goods
16 and services at competitively low prices and generate earnings to support morale, welfare, and recreation
17 (MWR) programs. The sale of AAFES merchandise and services is used for two general purposes: (1)
18 improve service members’ quality of life by providing a dividend to support MWR programs, and (2)
19 construct new AAFES facilities or replace old ones. AAFES maintains a wide range of retail, food, and
20 service facilities, ranging in size from the Base Exchange (BX) to small ancillary facilities.

21 **PURPOSE OF AND NEED FOR THE PROPOSED ACTION**

22 The purpose of the Proposed Action is to provide a modern sales, entertainment, and dining center at FSH
23 for military personnel and their families. This mixed-use Lifestyle Center would offer the FSH
24 community a modern town-center-style development with name-brand shops, eateries, and entertainment,
25 such as a movie theater or bowling alley. Lifestyle Centers combine many aspects of a shopping mall
26 with an old-fashioned town square. It is common for such centers to have a “Main Street” for cars to
27 drive through and with parking in front of many stores. The proposed Lifestyle Center brings a wide
28 array of shopping and entertainment options to service members and their families.

29 FSH supports approximately 36,000 personnel including military, civilian, and contractor personnel. The
30 proposed Lifestyle Center is needed because the current facilities are outdated and do not adequately
31 provide the necessary levels of service and quality merited by existing AAFES customers. As one of the
32 highest sales-generating exchanges within the AAFES system, the FSH PX is undersized to meet the
33 current population’s needs. Although parking is provided in the vicinity of the PX site, much of the
34 parking is to the north and east of the existing facility and inconveniently located away from the PX’s
35 south-facing entrance. Brooks Army Medical Center on FSH is one of the primary treatment locations for
36 wounded military personnel. Many of these personnel are temporarily or permanently disabled, thus
37 facility accessibility is important to maintain easily accessible options for “wounded warriors.”

38 **DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES**

39 **Proposed Action.**

40 AAFES identified FSH as a candidate installation for a proposed Lifestyle Center based on area growth
41 and the lack of available retail options at the installation serving military personnel and their families.
42 The following selection criteria were developed to guide the site-selection process:

- 43
- The site must be large enough to accommodate the proposed development.
 - The site should be located in a high-visibility area with ease of access from multiple points.
- 44

- 1 • The site should be within walking distance of residential areas within FSH.
- 2 • The site should be compatible with adjacent land uses.
- 3 • The site should present minimal environmental issues.

4 Preliminary plans position the Lifestyle Center and associated facilities at a location near the current
5 Commissary and PX serving the installation. The Lifestyle Center would be designed as a Main Street-
6 style promenade featuring name-brand retailers and tenants such as those found in modern retail
7 destination centers throughout the country. The proposed Lifestyle Center would be an architecturally
8 pleasing one-stop destination for shopping, dining, and entertainment intended to appeal to and satisfy the
9 needs of the modern military consumer. The proposed Lifestyle Center is anticipated to generate
10 approximately 800 new jobs in the local area.

11 The Lifestyle Center is proposed to include approximately 651,000 square feet (ft²) of new and
12 replacement retail, dining, and entertainment space. The proposed site is bounded by Henry T. Allen
13 Road to the north, Wilson Street to the south, Shafter Road to the east, and parts of Scott Road and Camp
14 Travis Road to the west. Currently the design of the proposed Lifestyle Center is ongoing. Although the
15 exact Lifestyle Center design and site boundary could shift, the approximate square footage of impacted
16 area is not expected to increase.

17 The Proposed Action consists of constructing approximately 651,000 ft² of retail space. Parking would
18 be constructed at an industry standard of five spaces per 1,000 ft² of retail space, totaling approximately
19 3,255 parking spaces. The total parking lot size, including drive lanes and access roads, would be
20 approximately 1,464,750 ft² (33.63 acres), based on the number of spaces and the industry standard
21 multiplier of 450 ft² of gross surface area per parking space. The Proposed Action assumes that all
22 required parking and roadway surfaces would be newly constructed. In addition to the area taken up by
23 retail space, parking, and roadway surfaces, approximately 10 acres would be used for sidewalks,
24 pathways, courtyards, walking zones, and other elements required to tie the Lifestyle Center together.

25 Although there are historic properties within the area of potential effect, it is not expected that any historic
26 properties at FSH would be demolished, or otherwise adversely affected as part of the Proposed Action.
27 Lifestyle Center architecture would be designed for compatibility with the existing historic architectural
28 context of FSH. In order to make adequate space to construct the Lifestyle Center, some existing
29 structures, parking areas, and roadway surfaces within the project footprint would need to be removed.
30 Demolition and removal of the existing PX, the largest structure in the project footprint, would be
31 coordinated with construction and operation of the new PX. Other structures and roadway and parking
32 surface would be removed and replaced according to the overall construction plan and Lifestyle Center
33 design plan. The Proposed Action would include the demolition of approximately 303,000 ft² of roadway
34 surfaces, 760,000 ft² of parking area, and 209,603 ft² of buildings.

35 **No Action Alternative.**

36 Under the No Action Alternative, AAFES would not construct a Lifestyle Center at FSH. Customers
37 would continue to use the existing congested, outdated, and undersized facilities. AAFES could decide to
38 invest in a different military location, which would provide no economic benefit to FSH. This could
39 indirectly result in a loss of revenue for the MWR fund for the military. Finally, customers would not be
40 able to enjoy the increased variety of services that the proposed Lifestyle Center would provide to
41 military personnel and their families.

42 **ALTERNATIVES CONSIDERED BUT NOT FURTHER EVALUATED IN DETAIL**

43 During development of the Proposed Action, AAFES and FSH considered alternatives to the Proposed
44 Action. These included using and modifying existing facilities. However, no adequate facilities to meet
45 the purpose and need of the Proposed Action currently exist at FSH. The existing PX, Popeyes

1 restaurant, and other community entertainment functions do not have the appropriate square footage or
2 parking to accommodate the Lifestyle Center concept. In addition it would be cost prohibitive to modify
3 existing community facilities that are inadequate to meet the mission of AAFES and the desired clientele.
4 There are extremely limited locations and existing facilities available on-installation due to new
5 construction and future build-out plans. Finally, this alternative for using existing community functions
6 and facilities does not meet the selection criteria, as listed earlier, and was therefore eliminated from
7 further detailed evaluation in the EA. Leasing of facilities off-installation was not considered a viable
8 alternative because it would not meet the mission of AAFES and little land is available for expansion due
9 to urban build-up around San Antonio. Because, by regulation, access to AAFES facilities is for
10 authorized patrons, construction or leasing facilities off-installation would not be proximate to these
11 intended users. Therefore, based on this evaluation, no viable alternative to the Proposed Action was
12 identified as other alternatives considered would not meet the selection criteria.

13 ENVIRONMENTAL CONSEQUENCES

14 Proposed Action

15 **Noise.** Short-term, minor, adverse noise impacts are anticipated as a result of demolition, paving, and
16 building activities under the Proposed Action. Acoustical environment effects from the use of heavy
17 equipment during construction activities would be expected. Noise generation would last only for the
18 duration of construction activities and would be isolated to normal working hours (i.e., between 7:00 a.m.
19 and 5:00 p.m.). Short-term, minor, adverse effects on the ambient noise environment are anticipated as a
20 result of the increase in construction vehicle traffic under the Proposed Action. Long-term, negligible to
21 minor, adverse effects on the ambient noise environment are anticipated as a result of increased vehicle
22 traffic to the completed Lifestyle Center.

23 **Land Use.** Short-term, negligible, adverse effects on land use would be expected from a temporary
24 increase in traffic and congestion associated with construction personnel and equipment, and temporary
25 traffic detouring around construction sites. The Proposed Action would be contained entirely within the
26 boundaries of FSH and would not have the potential to affect off-installation land use planning in the
27 surrounding San Antonio area.

28 **Air Quality.** Short-term, adverse effects would be expected from construction emissions and land
29 disturbance. All emissions associated with construction activities would be temporary in nature. The
30 proposed project includes demolition and removal of buildings, roads, and parking lots; and new
31 construction of retail space, sidewalks, and roadway surface.

32 **Geological Resources.** Short-term, negligible to minor, adverse effects on geological resources would be
33 expected during the construction of the Proposed Action. Demolition of existing buildings, parking areas,
34 and infrastructure at the site of the Proposed Action would involve disturbance of soil, removal of
35 existing vegetation, and elimination of current storm water handling infrastructure, which would
36 temporarily increase the potential for erosion and sedimentation until revegetation and long-term storm
37 water handling methods are established.

38 **Water Resources.** Short to long-term, minor, adverse effects on water resources would be expected.
39 The increase in installation water withdrawal as a result of the Proposed Action is projected to be
40 minimal. Erosion and sediment controls, storm water management, and spill prevention practices would
41 be implemented and properly maintained to minimize potential for adverse effects on water resources.
42 Although the increase in impervious surfaces is an irretrievable adverse effect, it is minor compared to the
43 amount of impervious cover on FSH and in the metropolitan San Antonio area. It would not be
44 significant because the area is already heavily developed and an extensive storm water drainage system is
45 already in place around the proposed site. FSH is not over the Edwards Aquifer recharge or contribution
46 zones which are approximately 10 miles to the north. Instead the proposed site is over the artesian zone,
47 which has much less influence on recharge into the Edwards Aquifer.

1 **Biological Resources.** Direct and indirect, short- and long-term, negligible to minor, adverse effects on
2 biological resources would be expected. No native, undeveloped, irreplaceable lands would be affected
3 as a result of the Proposed Action. Wildlife could be permanently displaced from the areas where
4 potential habitat might be cleared and temporarily dispersed from areas adjacent to the proposed Lifestyle
5 Center during construction periods. Noise created during construction and renovation activities could
6 affect wildlife and migratory birds that utilize the installation.

7
8 **Cultural Resources.** No significant effects on cultural resources would be expected. No historic
9 properties would be demolished or affected by the Proposed Action. Recommendations outlined in the
10 Historic Landscape Master Plan for FSH would be followed during construction and operation of the
11 Lifestyle Center.

12 **Socioeconomic Resources and Environmental Justice.** Direct, minor to moderate, short-term,
13 beneficial effects on socioeconomic resources would be expected. Increases in local employment levels
14 would be expected that would, therefore, result in beneficial effects on the local economy.

15 **Utilities, Infrastructure, and Transportation.** Short- to long-term, minor, adverse effects on utilities,
16 infrastructure and transportation would be expected. Wastewater systems on-installation are currently
17 deficient and the Proposed Lifestyle Center could cause limited overflows unless current deficiencies in
18 the system are addressed. Most construction debris would be recycled or ground into gravel for reuse.
19 The debris that cannot be recycled would be transported to a landfill. A new transportation network
20 including access roads, driveways, and parking lots would be constructed to accommodate the proposed
21 Lifestyle Center and associated facilities. Temporary effects on the transportation network would be
22 expected due to road and lane closures from construction and demolition activities.

23 **Hazardous Materials and Wastes.** Short-term, minor, adverse effects on hazardous materials and
24 wastes would be expected. The quantity of hazardous wastes generated from proposed construction
25 activities would be minor and would not be expected to exceed the capacities of existing hazardous waste
26 disposal facilities. Demolition of the existing structures within the proposed Lifestyle Center area could
27 generate asbestos-containing material (ACM) wastes and lead-based paint (LBP) waste. Any ACM and
28 LBP encountered during building demolition and cleanup would be handled in accordance with
29 established U.S. Army and FSH policy. The area associated with a former dry cleaning facility site would
30 be used for the newly constructed parking lot. If groundwater or soil potentially containing contaminants
31 is encountered during construction or demolition activities, it would be addressed in accordance with
32 applicable Federal and state regulations, U.S. Army policy, and FSH management procedures.

33 CUMULATIVE EFFECTS

34 CEQ regulations stipulate that the cumulative effects analysis in an EA should consider the potential
35 environmental effects resulting from “the incremental impacts of the action when added to other past,
36 present, and reasonably foreseeable future actions regardless of what agency or person undertakes such
37 other actions” (40 CFR 1508.7).

38 The Base Closure and Realignment Commission (BRAC Commission) recommended 17 realignment
39 actions for FSH. The U.S. Army prepared the *Base Realignment and Closure (BRAC) Actions Final*
40 *Environmental Impact Statement*. A Record of Decision (ROD) for the BRAC recommendations at FSH
41 and Camp Bullis was subsequently prepared and signed on May 17, 2007. Numerous military functions
42 from across the country are being relocated to FSH. Consequently, approximately 10,150 additional
43 personnel will be relocated to FSH, raising the installation’s average daily population to approximately
44 36,300 personnel. Construction or alteration of facilities at FSH will also be required to support incoming
45 personnel and missions. Implementing BRAC actions at FSH will require alteration of 979,100 ft² of
46 existing facility, construction of approximately 7 million ft² of new facilities, and construction of

1 approximately 375,400 ft² of vehicle parking and roads. Additionally, 501,800 ft² of
2 demolition/deconstruction will also be required.

3 Potential cumulative effects of implementing the proposed Lifestyle Center and the BRAC
4 recommendations would not be significant. The relocation of personnel under BRAC would have a short-
5 to long-term effects on the local economy. The proposed Lifestyle Center would have short- to long-term
6 beneficial socioeconomic effects and some short-term minor effects related to construction disturbances.

7 **Public Review and Interagency Coordination**

8 A public notice was published in the San Antonio Express News on [insert date] inviting the public to
9 review the Draft EA and Draft Finding of No Significant Impact (FNSI). The comment period closed on
10 [insert date].

11 **FINDING OF NO SIGNIFICANT IMPACT**

12 After a review of the EA prepared in accordance with the requirements of the National Environmental
13 Policy Act, the Council on Environmental Quality regulations, the U.S. Army Regulation (AR) 200-1,
14 *Environmental Protection and Enhancement*, 32 Code of Federal Regulations 989, as amended, and
15 receipt of public comments on the document, I have determined that the Proposed Action would not have
16 a significant impact on the quality of the human or natural environment and, therefore, an Environmental
17 Impact Statement does not need to be prepared. This decision has been made after taking into account all
18 submitted information and considering a full range of practical alternatives that would meet project
19 requirements and that are within the legal authority of U.S. Army.

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21 _____
22 Mary E. Garr
23 Colonel, US Army
24 Garrison Commander

Date: _____